

U.S. Department of Justice

United States Attorney Southern District of New York

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The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

August 5, 2014

BY ECF

The Honorable Thomas P. Griesa United States District Judge Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl Street, Chambers 1630 New York, New York 10007

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Re: <u>United States v. Fadlallah-Cheaitelly et al.</u> S4 11 Cr. 133 (TPG)

Dear Judge Griesa:

The Government writes, with the consent of defendants Jorge Fadlallah-Cheaitelly, Jaime Edery, and Roberto Chavez, to respectfully request that the Court adjourn the pretrial conference currently scheduled for August 11, 2014 until September 22, 2014. The defendants continue to review discovery and contemplate motions, and the parties are discussing pretrial resolutions of this matter.

The Government also moves to exclude from the Speedy Trial Act's operation the time between August 11 and September 22, 2014, in the interests of justice, to afford the defendants adequate time to prepare motions and review discovery, and to afford the parties time to discuss a possible resolution of this matter short of trial. See 18 U.S.C. § 3161(h)(7)(A). Defense counsel have expressly consented to such an exclusion on their clients' behalf.

Respectfully submitted,

PREET BHARARA United States Attorney

By: /s/ Michael Ferrara Assistant U.S. Attorney 212-637-2526

Avraham C. Moskowitz, Esq. Lawrence M. Herrmann, Esq.

Louis Fasulo, Esq.

Cc:

So ordered

8/6/14